

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Creditor Num. Claims: 22574

PROMESA

Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, HTA and ERS**

**REPLY OF THE SEVENTY-NINTH OMNIBUS OBJECTION (NON_SUSTANTIVE) OF
THE COMMONWEATH OF PR, PR HIGHWAYS AND TRASPORTATION
AUTHORITY AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT
OF THE COMMONWEATH OF PR TO DEFICIENT CLAIMS ASSERTING
INTERESTS BASED ON SALARY DEMANDS AND EMPLOYMENT OR SERVICES
PROVIDED**

To the Honorable United States District Court Judge Laura Taylor Swain:

The debtors in these Title III cases included employees or former employees who have a claim against the Employees Retirement System ("ERS"), and the Commonwealth of Puerto Rico related to contributions to the systems, wages owed and labor benefits. Also, labor lawsuits can be included under the PROMESA Law.

In my case I have one (1) claim number 22574 against Employee Retirement System of Commonwealth of Puerto Rico.

I reply and objected to the eighty-sixth objection (the "Eighty-Sixth Omnibus Objection") to the proofs of claim listed on Exhibit A hereto, each of which failed to provide a basis for the asserted claim.

I provided and included with the reply on Exhibit A the basis supporting documentation for asserting this claim.

JURISDICTION

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).

REPLY TO THE OBJECTIONS TO PROOFS OF CLAIM

1. I objected and I deny that I have Deficient Claims because they based on one or more statutes or laws passed by the Commonwealth, I provide basic information, such as the specific law number and year in which the statute was passed, what law the claimant asserts or how that law may have given rise to liabilities owed to the claimant by either the Commonwealth, HTA, ERS, or any other Title III debtor.

2. Claim Num. 22574 is about assert liabilities with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, I am providing the ERS certification that I contribute individually to this system for more than 10 years. This entity owes me the amount of \$21,979.35. Laws Num 3-2013 as amended is applicable in this claim. Evidence of this debt is included in Exhibit A.

3. I do not received by mailing any of those orders on August 13 or 19, 2019, the Court entered the *Order Granting in Part and Adjourning in Part Debtors' Motion for Entry of An Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, (C) Approving Proposed Mailing, and (D) Granting Related Relief* [ECF No. 8453] (the "Authorized Mailings Order).

NOTICE CERTIFICATION

I certify that I provide notification of this reply by mail to the secretary of the court, to the Board of Supervision and the creditors committee at the addresses provided.

Respectfully Submitted.

Dated: November 21, 2019
San Juan, Puerto Rico

Creditor Num. 22574

Frances E. Perez Soto
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